

COPY

CRIMINAL COMPLAINT

FILED
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT	CENTRAL DISTRICT OF CALIFORNIA
UNITED STATES OF AMERICA v. PAUL ANTHONY CIANCIA	DOCKET NO. MAGISTRATE'S CASE NO.
	NOV 2 2013 CENTRAL DISTRICT OF CALIFORNIA BY DEPUTY

Complaint for violation of Title 18, United States Code, Sections 1114 and 37

NAME OF MAGISTRATE JUDGE HONORABLE JACQUELINE CHOOLJIAN	UNITED STATES MAGISTRATE JUDGE	LOCATION Los Angeles, California
DATE OF OFFENSE 11/1/13	PLACE OF OFFENSE Los Angeles County	ADDRESS OF ACCUSED (IF KNOWN)

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

[18 U.S.C. § 1114]

On or about November 1, 2013, in Los Angeles County, within the Central District of California, defendant PAUL ANTHONY CIANCIA killed and attempted to kill officers and employees of the United States and of an agency in the executive branch of the United States government, namely, employees of the Transportation Security Administration, while such officers and employees were engaged in and on account of the performance of official duties.

[18 U.S.C. § 37]

On or about November 1, 2013, in Los Angeles County, within the Central District of California, defendant PAUL ANTHONY CIANCIA unlawfully and intentionally, using a firearm, performed an act of violence at Los Angeles International Airport, an airport serving international civil aviation, that caused and was likely to cause serious bodily injury and death.

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

(See attached affidavit which is incorporated as part of this Complaint)

MATERIAL WITNESSES IN RELATION TO THIS CHARGE: N/A

Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT STEPHEN J. KHOOBYARIAN
	OFFICIAL TITLE Special Agent – Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

SIGNATURE OF MAGISTRATE JUDGE ⁽¹⁾	JACQUELINE CHOOLJIAN	DATE
		November 2, 2013

⁽¹⁾ See Federal Rules of Criminal Procedure 3 and 54

A F F I D A V I T

I, Stephen J. Khoobyarian, being duly sworn, hereby depose and state the following:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), and I have been so employed for over eight years. I am currently assigned to the FBI's Long Beach Residence Agency Joint Terrorism Task Force (JTTF), where I investigate international terrorism, domestic terrorism, and other violations of Federal law, including those that occur within the airport environment and on board aircraft.

2. This affidavit is in support of a complaint charging PAUL ANTHONY CIANCIA ("CIANCIA") with violating Title 18, United States Code, Section 1114: Murder of a Federal Officer; and Title 18, United States Code, Section 37: Violence at International Airports; on November 1, 2013, at the Los Angeles International Airport ("LAX"), located in Los Angeles, California, in the Central District of California.

3. The facts set forth in this affidavit are based on my personal observations, my training and experience, and information obtained from other law enforcement officers and witnesses. This affidavit is intended to show that there is probable cause for the requested complaint and does not purport to set forth all of my knowledge or investigation into this matter.

4. Title 18, United States Code, Section 1114 prohibits, in pertinent part, "kill[ing] . . . any officer or employee of the United

States or of any agency in any branch of the United States Government . . . while such officer or employee is engaged in or on account of the performance of official duties."

5. Title 18, United States Code, Section 37 prohibits, in pertinent part, the following conduct: "unlawfully and intentionally, using any device, substance, or weapon - perform[ing] an act of violence at an airport serving international civil aviation that causes or is likely to cause serious bodily injury . . . or death."

6. According to eyewitnesses and video surveillance footage, on November 1, 2013, at approximately 9:20 a.m., CIANCIA entered Terminal 3 at LAX and approached the Transportation Security Administration ("TSA") checkpoint. CIANCIA pulled a Smith & Wesson .223 caliber M&P-15 assault rifle out of his bag and fired multiple rounds at point-blank range at a TSA officer who was then on duty and in uniform, wounding the officer. CIANCIA began to walk up an escalator, looked back at the wounded officer, who in video appeared to move, and returned to shoot the wounded officer again. The TSA officer was fatally wounded. CIANCIA then fired his weapon on at least two other uniformed, on-duty TSA employees and one civilian passenger, all of whom sustained gunshot wounds. CIANCIA was pursued and shot by a sergeant and an officer of the Los Angeles Airport Police. Multiple terminals were evacuated and air traffic into and out of LAX was halted, and air travel across the globe was disrupted.

7. I learned from other law enforcement agents that from a bag that CIANCIA carried with him at the scene, agents recovered a handwritten letter, signed by CIANCIA, stating that CIANCIA had "made the conscious decision to try to kill" multiple TSA employees. Addressing TSA employees, the letter stated that CIANCIA wanted to "instill fear in your traitorous minds." CIANCIA's possessions on the scene also included five magazine clips of ammunition for his assault rifle.

8. From my training and experience, I know that LAX is an airport serving international civil aviation. TSA is a federal agency within the Department of Homeland Security, in the executive branch of the federal government, charged with securing the airports of the United States and screening all commercial airline passengers and baggage. TSA officers are employees of the United States government.

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9. Based on the foregoing, I believe that there is probable cause to believe that PAUL ANTHONY CIANCIA violated Title 18, United States Code, Section 1114: Murder of a Federal Officer; and Title 18, United States Code, Section 37: Violence at International Airports.

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STEPHEN J. KHOOBYARIAN
Special Agent-FBI

Sworn and subscribed to before
me this 2nd day of November, 2013.

JACQUELINE CHOLJIAN

UNITED STATES MAGISTRATE JUDGE